

July, 2001

Responses to Comments on Ethylene Glycol Ethers by the American Chemistry Council

Comments by the Ethylene Glycol Ethers Panel of the American Chemistry Council (ACC) were received in a letter dated July 12, 2001 from Susan A. Lewis, Ph.D., Ethylene Glycol Ethers Panel Manager. (In a earlier letter (dated March 28, 2001), the Panel urged OEHHA to delete ethylene glycol methyl ether (EGME), ethylene glycol ethyl ether (EGEE), and their acetates (EGMEA and EGEEA) from its list of priority candidates).

Comment 1. In the table on page 38 of the summary document, the current reference to "Glycol Ethers (EE and ME but not BE)" should be replaced by "EGME, EGEE, EGMEA and EGEEA."

Response 1. The reference has been changed to Ethylene Glycol Ethers (EGEE, EGME, EGEEA, and EGMEA).

Comment 2. In the Appendix C-2 chemical toxicity summary for these compounds, the title should be changed from "Ethylene Glycol Ethers" to "EGME, EGEE, EGMEA and EGEEA," reflecting the fact the summary only discusses these four ethylene glycol ethers.

Response 2. The title has been changed to "Ethylene Glycol Ethers (EGME, EGEE, EGMEA, EGEEA)."

The Toxic Air Contaminant Identification List Summaries, which were released by the ARB in September 1997, state: "Glycol ethers, as defined in the federal Clean Air Act Section 112(b) and listed as "Must Be Quantified for Emissions Inventory" for the Air Toxics "Hot Spots" Program (AB 2588), are diethylene glycol dimethyl ether, diethylene glycol monobutyl ether, diethylene glycol monoethyl ether, diethylene glycol monomethyl ether, ethylene glycol diethyl ether, ethylene glycol dimethyl ether, ethylene glycol monobutyl ether, ethylene glycol monoethyl ether, ethylene glycol monoethyl ether acetate, ethylene glycol monomethyl ether, ethylene glycol monomethyl ether acetate, ethylene glycol monopropyl ether, and triethylene glycol dimethyl ether." This statement is based on the actual wording of the listing for glycol ethers as Toxic Air Contaminants: "Glycol ethers: Includes mono- and di-ethers of ethylene glycol, diethylene glycol, and triethylene glycol ($R(OCH_2CH_2)_n-OR'$ where $n = 1, 2$ or 3 $R =$ alkyl or aryl groups $R' = R, H$, or groups which, when removed, yield glycol ethers with the structure; $R(OCH_2CH_2)_n-OH$. Polymers are excluded from the glycol category." ARB also stated: "Currently, the inclusion of propylene glycol ethers in the definition of glycol ethers is being debated within the United States Environmental Protection Agency (U.S. EPA), but no decisions have been made."

Thus although EGEE, EGEEA, EGME, and EGMEA are the glycol ethers of most concern (and some of the most thoroughly studied), OEHHA does not have the authority to ignore other glycol ethers which are listed. OEHHA staff are concerned that some portion of the unspiciated 2,922,744 pounds of Hot Spots glycol ether emissions may be comprised of EGME, EGEE, EGMEA and EGEEA. Even if none of the unspiciated emissions were of those four glycol ethers, those emitted are still likely to be listed Toxic Air Contaminants.